

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

NO. 3:24-cv-05095-BHS

NO. 3:24-cv-05095-BHS
NO. 3:24-cv-05029-BHS

STATE OF WASHINGTON,
DEPARTMENT OF LABOR AND
INDUSTRIES,

DECLARATION OF SARAH KORTOKRAX¹

Plaintiff,

V.

GEO SECURE SERVICES, LLC, THE
GEO GROUP, INC.,

Defendants.

NO 3:24-cv-05029-BHS

STATE OF WASHINGTON,
DEPARTMENT OF HEALTH.

Plaintiff.

v.

THE GEO GROUP, INC.

Defendant.

¹ The Department of Labor and Industries and the Department of Health have contemporaneously filed a motion to consolidate Case No. 3:24-cv-05095 and Case No. 3:24-cv-05029. The same documents in support of their motion for preliminary injunction will be filed in both case numbers until the Court decides their motion to consolidate or otherwise instructs the agencies to file under one case number.

1 I, Sarah Kortokrax, declare under the penalty of perjury under the laws of the United
2 States that the following is true and correct.

3 1. I am over the age of eighteen and am otherwise competent to testify. I make these
4 statements on personal knowledge and belief. I am an assistant attorney general assigned to
5 represent the Department of Labor and Industries. I am the section chief for the Olympia office
6 for the Labor and Industries Division, and I have access to the records maintained by our office
7 in L&I cases.

8 2. The following documents are true and correct copies of settlement documents, between
9 L&I and GEO, resolving violations found by L&I:

10 Exhibit 1 2015 Sidebar

11 Exhibit 2 2015 Executed Agreement of Parties

12 DATED this 27th day of February, 2024 in Seattle, Washington.



13
14 SARAH KORTOKRAX
15 Assistant Attorney General
WSBA No. 38392

CERTIFICATE OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 29th day of February 2024 at Tumwater, Washington.

/s/ Ellen Range
ELLEN RANGE, WSBA No. 51334
Assistant Attorney General